

Document Log Item

Addressing	
From	To
Eugenia Chow/R9/USEPA/US	Daniel Stralka/R9/USEPA/US@EPA Daniel Stralka/R9/USEPA/US
CC	BCC
Michael Montgomery/R9/USEPA/US@EPA Debbie Schechter/R9/USEPA/US@EPA	
Description Form Used: Memo	
Subject	Date/Time
Hickam risk assessments	04/19/2012 10:57 AM
# of Attachments	Total Bytes
0	14,100
NPM	Contributor
Processing	
Comments	

Body

Document Body

Hi Dan,

Per my voicemail, here is a summary table of the cleanup numbers used at Hickam and several of the associated reports. As you can see from the table, DOH has changed the values over time and the IG has raised questions about the changes. We would like for you to review the risk assessment and basis for the development of these numbers to see if EPA is in agreement.

The documents I've attached include:

1. Removal Action Report (RAR) - summarizes removal actions taken and the basis for their cleanup values

2. Environmental Hazard Evaluation (EHE) - the risk assessment and basis for their remedial action cleanup values
3. draft Response Action Memorandum (RAM) - state version of a ROD
4. DOH comments on these documents (remedial documents file)

please feel free to call me if you have questions or need other reference documents for the site.

thanks,
Eugenia
2-3160

----- Forwarded by Eugenia Chow/R9/USEPA/US on 04/19/2012 10:03 AM -----

From: "Sadoyama, Eric J" <eric.sadoyama@doh.hawaii.gov>
To: Eugenia Chow/R9/USEPA/US@EPA
Cc: "Grange, Fenix" <fenix.grange@doh.hawaii.gov>
Date: 03/22/2012 03:29 PM
Subject: Hickam Communities - site-specific risk standards and EALs

Eugenia,

Here are the site-specific EALs for the Hickam Communities Remedial Action site, as well as HDOH's default Tier 1 EALs:

Hickam Communities – Site-Specific Risk Standards and EALs		
Site-Specific Risk Standard	Action Taken Using This Standard	Chlordane (mg/kg)
2006 HHRA	Removal Actions #1A & #1B	23.4
2010 APRA 3	Removal Action #2A	35
2010 APRA 2	Removal Action #2B	35
2010 APRA 1	Removal Action #2C	35
2011 HHRE	Removal Action #3	23.4
2012 EHE	Remedial Action	38
NOTE: Due to the presence of multiple COPCs, decisions on removal actions and remedial actions at Hickam Communities have been based on cumulative Hazard Index (HI) values. EALs shown above represent the levels that would be used if Hickam Communities were a single-contaminant site.		
HDOH Tier 1 EALs (statewide defaults)		
HEER Document		Chlordane (mg/kg)
Screening For Environmental Concerns At Sites With Contaminated Soil and Groundwater: Interim Final. May 2005.		1.6
Pesticides in Former Agricultural Lands and Related Areas: Updates on Investigation and Assessment. 5/11/2007, 2007-251-RB.		16
Screening for Environmental Hazards at Site with Contaminated Soil and Groundwater, Fall 2011 Updates. Dec 2011, 2011-716-RB.		16

HC's EALs are based on: (1) changing the exposure period from 30 yr to 6 yr; (2) changing the target cancer risk from 10^{-6} to 10^{-5} or 10^{-4} ; (3) changing the child soil ingestion rate from 200 mg/day to 100 mg/day; (4) changing the dermal absorption factor from 0.10 to 0.05; and (5) updating the reference dose and cancer slope factor values. Let me know if you need the supporting documentation.

Please don't hesitate to call or email if you have any questions.

Thanks,

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Eric Sadoyama, Remedial Project Manager
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From: Grange, Fenix

Sent: Thursday, March 22, 2012 9:06 AM

To: 'Eugenia Chow'

Cc: Sadoyama, Eric J

Subject: RE: hickham cleanup numbers

Yes.

Eric, would you follow up with the table that shows the changes in action levels over time? I believe the table footnotes describe the nature of each change. We also have a risk reassessment document from Dr. Herman Gibb at TetraTech, that recalculates the toxicity of aldrin and dieldrin using current IRIS methodology.

Fenix

From: Eugenia Chow [<mailto:Chow.Eugenia@epamail.epa.gov>]

Sent: Wednesday, March 21, 2012 11:06 AM

To: Grange, Fenix

Subject: hickham cleanup numbers

Fenix,

Thanks for the discussion on Hickham yesterday. I really appreciate the info. I was just looking over my notes and I wanted to confirm the cleanup numbers that DOH used for the contaminants of concern (Dieldrin, Aldrin and Chlordane?) before my discussions w/ Mike and Debbie.

Could you please clarify the values used initially and the ones that were used after the site specific risk assessments were completed?

thanks,

Eugenia

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